

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

GEORGE ALLEN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No: CIV-22-244-PRW
	)	
CLEAN UNIFORM CO.,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Defendant Clean Uniform Company (“Clean”) hereby gives notice that it has removed this action from the District Court of Oklahoma County, Oklahoma, to the United States District Court for the Western District of Oklahoma, pursuant to 28 U.S.C. §§ 1331 and 1446. Clean states the following in support of this removal:

1. On or about October 18, 2021, Plaintiff George Allen filed this action in the District Court for Oklahoma County, Oklahoma, as Case No. CJ-2021-4416. A Summons and copy of the Petition were served on Clean via certified mail on March 4, 2022. Copies of the Summons and Petition served on Clean are attached hereto as Exhibits “1” and “2”.

2. In his one-count Petition, Plaintiff alleges that his employment with Clean was terminated in violation of the Family and Medical Leave Act, 29 U.S.C. §§ 2601 *et seq.*

3. The district courts have original jurisdiction over all civil actions arising under the Constitution, laws, or treaties of the United States. 28 U.S.C. § 1331.

4. Because the Petition brings a claim under a federal law, the federal question requirements of 28 U.S.C. §§ 1331 and 1441 are satisfied.

5. This Notice of Removal is timely filed, pursuant to 28 U.S.C. § 1446(b), within 30 days of Clean being served with the Summons and Petition.

6. The United States District Court for the Western District of Oklahoma is the appropriate venue for removal of Plaintiff's Complaint. The District Court for Oklahoma County, Oklahoma is within the Western District of Oklahoma. 28 U.S.C. § 1441(a).

7. All documents filed in the state court action are attached hereto as Exhibits "1" and "2". A copy of the docket sheet in Case No. CJ-2021-4416 is attached as Exhibit "3".

WHEREFORE, Defendant Clean gives notice that this action is hereby removed to the United States District Court for the Western District of Oklahoma.

Respectfully submitted,

*s/Nathan L. Whatley*

s/Nathan L. Whatley

Nathan L. Whatley, OBA #14601

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**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing, and mailed a copy of this Notice of Removal to:

Redmond P. Kemether

Law Offices of Redmond P. Kemether, P.C.

500 North Walker, Suite I

Oklahoma City, OK 73102

*/s/Nathan L. Whatley*